

  
CLERK OF THE COURT

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14 *Attorneys for Plaintiff*

15 **DISTRICT COURT**  
16 **CLARK COUNTY, NEVADA**

17 DAN BRANDON BILZERIAN, an Individual

18 Plaintiff,

19 v.

20 DIRTY WORLD, LLC, a Delaware limited  
21 liability company, d/b/a THEDIRTY.COM;  
22 HOOMAN KARAMIAN, an individual, d/b/a  
23 Nik Richie; DOES I-X inclusive; and ROE  
24 BUSINESS ENTITIES I-X, inclusive

25 Defendants.

Case No.: A- 15 - 722801 - C  
Dept. No.:

XXXI I

26 **COMPLAINT**

27 Plaintiff, by and through his undersigned counsel of record, hereby alleges against the  
28 Defendants as follows:

- 29 1. Plaintiff is and was at all times relevant to this action a Nevada resident.
- 30 2. Defendant Dirty World, LLC ("Dirty World") is and at all relevant times has been  
31 a Delaware limited liability company that does business as "TheDirty.com" and owns and  
32 operates a website called "TheDirty.com."
- 33 3. Upon information and belief, Defendant Hooman Karamian is an individual  
34 residing in Arizona who goes by the name Nik Richie ("Richie"). Richie is the owner of Dirty  
35 World and personally supervises and manages TheDirty.com website for Dirty World.
- 36 4. Plaintiff does not know the true names of the individuals, corporations,

1 partnerships and entities sued and identified in fictitious names as DOES I through X, ROE  
2 BUSINESS ENTITIES I through X. Plaintiff will request leave of this Honorable Court to  
3 amend this Complaint to show the true names and capacities of each fictitious defendants when  
4 Plaintiff discovers the information.

#### 5 JURISDICTION AND VENUE

6 5. This Court has subject matter jurisdiction over this case and venue is proper in  
7 Clark County, because the Plaintiff is a Clark County, Nevada resident and because the claims at  
8 issue involve defamatory statements that were published in, among many other places, Clark  
9 County, Nevada.

#### 10 GENERAL ALLEGATIONS

11 6. Plaintiff and Richie have a long, adversarial history. Plaintiff has frequently been  
12 targeted by the Defendants on Defendants' website, and Defendants have engaged in actionable  
13 conduct toward the Plaintiff in the past.

14 7. On or about August 1, 2015, a story appeared on Defendants' website wherein a  
15 young woman, herein identified as Jane Doe I, misrepresented that she had engaged in sexual  
16 relations with the Plaintiff and that the Plaintiff had transmitted a sexually-transmitted disease to  
17 her.

18 8. The statement regarding the Plaintiff was submitted to Defendants' website by  
19 Jane Doe I, but it was Richie who found the statement and made the determination, on behalf of  
20 the Defendants, to publish the false and defamatory statement, along with photos of several  
21 young women, presumably including Jane Doe I, on the website, which is accessible to anyone  
22 with access to the internet.

23 9. Richie also commented on the defamatory statement, thereby adding to the false  
24 and defamatory information on Defendants' website.

25 10. Plaintiff has never had sexual relations with any of the women from the  
26 photograph on Defendants' website, nor has Plaintiff ever had or transmitted the sexually-  
27 transmitted disease attributed to him by the Defendants and Jane Doe I.  
28

1           11.    The false and defamatory information was published by the Defendants with the  
2 intent to harm the Plaintiff's reputation due to the prior history between the Defendants and the  
3 Plaintiff. The Defendants made the decision to publish the false information on their website and  
4 therefore are the publishers of the information as a matter of law.

5           12.    Defendants knew or should have known that the false and defamatory statements  
6 were not true prior to publishing them.

7           13.    Defendants' publication of the false and defamatory statements constitutes  
8 defamation per se because the statements related to Plaintiff having and transmitting a sexually-  
9 transmitted disease and because the statements were published to harm Plaintiff's personal and  
10 business reputation.

11          14.    Defendants' false publications/statements are libelous and slanderous on their  
12 face. The statements have a clear tendency to injure Plaintiff personally and in his occupation  
13 because the statements were published on a website that was transmitted to anyone with access  
14 to the internet. Defendants' statements about Plaintiff naturally harm Plaintiff's reputations by  
15 impugning and placing into doubt his honesty and integrity, and the false statements have had the  
16 natural effect of decreasing the number of people willing to engage in business with Plaintiff,  
17 thereby negatively impacting Plaintiff's business.

18          15.    As a proximate result of Defendants' false publications/statements, Plaintiff has  
19 suffered loss of his reputation, shame, mortification, and hurt feelings all to his general damages  
20 in an amount in excess of \$10,000, the exact amount to be proven at trial.

21          16.    As a proximate result of Defendants' false publications/statements, Plaintiff has  
22 suffered loss of his reputation, shame, mortification, and hurt feelings all to his special damages  
23 in an amount in excess of \$10,000, the exact amount to be proven at trial.

24          17.    As a proximate result of Defendants' false publications/statements, Plaintiff has  
25 been required to retain the undersigned counsel to prosecute the instant action and is entitled to  
26 an award of his reasonable attorneys' fees and costs associated with the instant action.

27    ///

28    ///

1 **FIRST CLAIM FOR RELIEF**

2 **(DEFAMATION PER SE)**

3 18. Plaintiff hereby incorporates by reference the allegations of Paragraphs 1 through  
4 17 as though fully set forth herein.

5 19. Plaintiff has enjoyed a good reputation, both generally and in his occupation, for a  
6 number of years.

7 20. On or about August 1, 2015, Defendants published a story on their website  
8 articulating that Plaintiff had transmitted a sexually-transmitted disease to Jane Doe I and then  
9 commented on the story and the accompanying photograph of several women, including,  
10 presumably, Jane Doe I.

11 21. These statements are all false and defamatory and constitute defamation per se  
12 because the statements are harmful to the Plaintiff's personal and business reputation.  
13 Defendants' false publications were disseminated to anyone with access to the internet and  
14 Defendants' website.

15 22. The above-quoted false statements published by Defendants available to countless  
16 millions of people with access to Defendants' website, the exact number of whom actually read  
17 the defamatory statements being unknown at this time to Plaintiff.

18 23. The aforementioned statements/publications are false as they pertain to Plaintiff,  
19 as Plaintiff has never had the sexually-transmitted disease in question and has never met Jane  
20 Doe I.

21 24. Defendants' false publications/statements are libelous and slanderous on their  
22 face. The statements have a clear tendency to injure Plaintiff personally and in his occupation.  
23 Defendants' statements about Plaintiff naturally harm Plaintiff's reputations by impugning and  
24 placing into doubt his honesty and integrity, and the false statements have had the natural effect  
25 of decreasing the number of people willing to engage in business with Plaintiff, thereby  
26 negatively impacting Plaintiff's business.

27 25. As a proximate result of Defendants' false publications/statements, Plaintiff has  
28 suffered loss of his reputation, shame, mortification, and hurt feelings all to his general damages

1 in an amount in excess of \$10,000, the exact amount to be proven at trial.

2 26. As a further proximate result of Third-Party Defendants' false  
3 publications/statements, Plaintiff has suffered the following special damages: the false  
4 publications/statements have had the natural effect of decreasing the number or individuals  
5 willing to engage in business with Plaintiff, thereby decreasing Plaintiff's business. Plaintiff has  
6 been specially damaged in an amount in excess of \$10,000, the exact amount to be proven at  
7 trial.

8 27. Further, Plaintiff is entitled to special damages because the  
9 publications/statements are defamation per se as they have the natural effect of damaging  
10 Plaintiff's professional reputation and improperly suggest that Plaintiff has and has transmitted a  
11 sexually-transmitted disease.

12 28. Defendants' false publications/statements were published with malice as  
13 Defendants knew that these publications/statements were false when made and/or had reason to  
14 doubt the truthfulness of these publications/statements when made. Further, Defendants' history  
15 or animosity toward Plaintiff was the reason for Defendants' publication of these defamatory  
16 publications/statements on their website, again demonstrating Defendants' malice. Thus,  
17 Plaintiff is entitled to an award of punitive damages against Defendants.

18 29. As a result of the aforementioned conduct on the part of Third-Party Defendants,  
19 it has been necessary for Third-Party Plaintiffs to hire an attorney to prosecute this matter, such  
20 that an award of reasonable attorney's fees is appropriate in this matter.

21 **SECOND CLAIM FOR RELIEF**

22 **(PRELIMINARY AND PERMANENT INJUNCTION)**

23 30. Plaintiff hereby incorporates by reference the allegations of Paragraphs 1 through  
24 29 as though fully set forth herein.

25 31. Immediate and irreparable injury will result to Plaintiff unless this Court enters an  
26 injunction, pursuant to NRCP 65, enjoining Defendants and their agents, servants, employees,  
27 attorneys, subsidiaries and any other individual or entity in active concert or participation with it  
28 who receives actual notice of the order, from publishing the aforementioned defamatory

1 statements/publications.

2 32. Defendants' actions in publishing the aforementioned defamatory  
3 statements/publications are causing irreparable harm to Plaintiff because (1) injuries related to  
4 Plaintiff's potential loss of business cannot be readily quantified and relief may never be  
5 forthcoming; and (2) Defendants' continuing conduct in publishing the defamatory  
6 statements/publications inflicts injury to Plaintiff's goodwill and reputation.

7 33. Plaintiff has a likelihood of success on the merits given that there is no dispute  
8 that Defendants have published false statements of fact about Plaintiff that are defamatory on  
9 their face. Plaintiff has a likelihood of success as to defamation per se due to the fact that the  
10 aforementioned defamatory statements/publications involve misstatements about Plaintiff having  
11 and spreading a sexually-transmitted disease.

12 34. In view of the fact that the damage Plaintiff has sustained, and continues to  
13 sustain, as a result of Defendants' unlawful activities, Plaintiff has no adequate remedy at law.

14 35. Accordingly, Plaintiff is entitled to a judgment enjoining Defendants from  
15 publishing the aforementioned defamatory statements regarding Plaintiff.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiff prays that the Court enter judgment as follows:

18 1. Awarding Plaintiff actual damages from Defendants in an amount in excess of  
19 \$10,000.

20 2. Awarding Plaintiff actual damages from Defendants in an amount in excess of  
21 \$10,000.

22 3. Issuing an order preliminarily and permanently enjoining Defendants' and their  
23 respective agents, servants, officers, directors, employees and all persons acting in concert with  
24 them, directly or indirectly, from publishing the defamatory statements about the Plaintiff  
25 articulated in this Complaint;  
26  
27  
28



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14 *Attorneys for Plaintiff*

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 **DAN BRANDON BILZERIAN, an Individual**

18 **Plaintiff,**

19 **v.**

20 **DIRTY WORLD, LLC, a Delaware limited**  
21 **liability company, d/b/a THEDIRTY.COM;**  
22 **HOOMAN KARAMIAN, an individual, d/b/a**  
23 **Nik Richie; DOES I-X inclusive; and ROE**  
24 **BUSINESS ENTITIES I -X, inclusive**

25 **Defendant.**

Case No.:

Dept. No.:

26 **INITIAL APPEARANCE FEE**  
27 **DISCLOSURE**  
28 **(NRS CHAPTER 19)**

29 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for  
30 parties appearing in the above-entitled action as indicated below:

31 Name of Plaintiff:

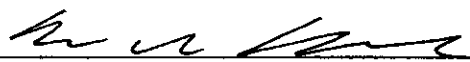
\$ 270.00

32 **TOTAL REMITTED**

**\$270.00**

33 DATED this 2 day of August, 2015.

34 **HOLLEY DRIGGS WALCH**  
35 **FINE WRAY PUZEY & THOMPSON**

36   
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